

REMARKS

By this amendment, Applicants have amended claims 1, 17, 19, and 20. As a result, claims 1, 3-9, 11-17, and 19-20 are pending in this application. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the rejections and reserve the right to pursue the full scope of the subject matter of the original claims, or claims that are potentially broader in scope, in the current and/or a related patent application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 9-16 are rejected under 35 U.S.C. 112, first paragraph, as allegedly failing to comply with the written description requirement. The Office asserts that the claims allegedly contain subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventors, at the time the application was filed, had possession of the claimed invention. In particular, the Office asserts that program code embodied in at least one computer-readable storage medium is allegedly not described in the specification. However, Applicants respectfully disagree and assert that page 7, lines 23-24, of the originally filed application provides sufficient description for these claims (central processing unit 230, network interfaces 232, and sufficient random access memory 234 and high density storage 236). Applicants respectfully request that the Office withdraw this rejection.

Claims 1, 3-8, 9-17, 19, and 20 are rejected under 35 U.S.C. 101 because the claimed invention is allegedly directed to non-statutory subject matter. With respect to independent claims 1 and 17, Applicants have amended the claims to include "at least

one computing device” and respectfully request that the Office withdraw this rejection. With respect to independent claim 9, Applicants respectfully disagree with the Office’s rejection. As stated in the MPEP 2106.01, “[w]hen functional descriptive material is recorded on some computer-readable medium, it becomes structurally and functionally interrelated to the medium and will be statutory ... since use of technology permits the function of the descriptive material to be realized.” Claim 9 recites: “[a] computer program comprising program code embodied in at least one computer-readable storage medium”. Accordingly, Applicants assert that claim 9 is directed towards statutory subject matter and respectfully request that the Office withdraw this rejection.

Claims 1, 3-9, 11-17, 19 and 20 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,901,399, Corston et al. (Corston). In order to maintain a proper rejection under 35 U.S.C. § 102, the Office must show that a single reference discloses each feature of the claimed invention. In particular, the Office must show that “[t]he identical invention... [is] shown in as complete detail as is contained in the... claim” to maintain a rejection under 35 U.S.C. § 102. See, e.g., MPEP § 2131, citing *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). To this extent, as recently reiterated by the Federal Circuit, in order to anticipate the claimed inventions, the reference must “disclose[] within the four corners of the document not only all of the limitations claimed but also all of the limitations arranged or combined in the same way as recited in the claim.” *Net MoneyIN, Inc. v. VeriSign, Inc.*, No. 2007-1565, pp. 17-18 (Fed. Cir. 2008). Applicants respectfully submit that the Office fails to present such a showing.

For example, with respect to claim 1, Applicants respectfully submit that the Office

fails, *inter alia*, to show that Corston discloses “a semantic taxonomy ... containing semantic node terms in a hierarchical structure, each semantic node term identifying groups of related keywords; ... [and] enhanc[ing] a users keyword query entry **with the semantic node term that identifies the keyword query term** in the users keyword query to create an enhanced keyword query” as claimed therein. (Emphasis added).

In support of the rejection, the Office points to Col. 30, line 38 – Col. 31, line 17 of Corston to allegedly disclose this feature of claim 1. See Office Action, pages 6-7. However, as cited by the Office, Corston discloses performing semantic expansion of words in the original logical form. “[T]he semantic expansion is performed by examining each content word in the original logical form, and expanding the word to include synonyms, hypernyms, hyponyms, or other words having a semantic relation to the original content word”. See Corston, Col. 30, lines 47-51. In other words, Corston expands the original logical form of the content word to include various synonyms. In contrast, claim 1 provides for enhancing a users keyword query entry with the semantic node term that identifies the keyword query term, which is a term that identifies a group of related keywords. For example, in the originally filed application, the example of “video player for PC” as the keyword query term is enhanced to include the semantic node term “multimedia”. See Application, page 9, lines 12-13. The term “multimedia” is a semantic node term that identifies a group of words, one of which is “video player”. As such, Applicants assert that Corston fails to disclose each and every feature of claim 1.

In light of the above, Applicants respectfully request withdrawal of the rejections of claim 1 and claims 3-8, which depend therefrom, as allegedly being disclosed by Corston.

With respect to claim 9, Applicants submit that the Office fails, *inter alia*, to show that Corston discloses a computer program comprising program code embodied in at least one computer-readable storage medium, which when executed, enables a computer system to implement a method of automatically providing expanded keyword searches to increase the scope of keyword searches that includes all the features claimed therein. For example, for reasons that should be clear from the discussion of Corston above, Applicants submit that Corston fails to disclose the computer program of claim 9, including “creating a semantic taxonomy containing semantic node terms in a hierarchical structure, each semantic node term identifying groups of related keywords; ... [and] automatically, without user intervention, enhancing a users keyword query to create an enhanced keyword query ... including both the keyword query term and the semantic node term” as claimed therein. As a result, Applicants respectfully request withdrawal of the rejections of claim 9 and claims 11-16, which depend therefrom, as allegedly being anticipated by Corston.

With respect to claim 17, Applicants submit that the Office fails, *inter alia*, to show that Corston discloses a method for a computer search system to interrogate a database that automatically provides expanded keyword search queries that includes all the features claimed therein. For example, for reasons that should be clear from the discussion of Corston above, Applicants submit that Corston fails to disclose the method of claim 17, including “providing a semantic taxonomy on at least one

computing device, the semantic taxonomy containing semantic node terms in a hierarchical structure, each semantic node term identifying groups of related keywords; ... [and] a relevant document finder on the at least one computing device which automatically, without user intervention, enhances a users keyword query entry with the semantic node term that identifies the users keyword query in the users keyword query to automatically create an enhanced keyword query ... including both the keyword query term and the semantic node term” as claimed therein. As a result, Applicants respectfully request withdrawal of the rejections of claim 17 and claims 19-20, which depend therefrom, as allegedly being anticipated by Corston.

Claims 6-8 and 14-16 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Corston, in view of U.S. Patent Application No. 2003/0126136, Omoigui (Omoigui). Applicants note that the Office relies on its rejection of independent claims 1 and 9, from which these claims depend. To this extent, Applicants incorporate the arguments presented above with respect to claims 1 and 9. Further, Applicants submit that the proposed addition of Omoigui, even if, *arguendo*, proper, fails to address the deficiencies discussed above with respect to the rejection of claims 1 and 9. As a result, Applicants respectfully request withdrawal of these rejections.

Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's

combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary and/or in a related patent application, either of which may seek to obtain protection for claims of a potentially broader scope.

In light of the above, Applicants respectfully request withdrawal of all pending rejections of the claims. Should the Examiner require anything further to place the application in condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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Dated: July 15, 2010